

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

UNITED STATES OF AMERICA)	
)	
VS.)	CR. NO. MO-22-CR-154
)	
RAYMOND CHARLES JR.)	

**NOTICE TO DEFENDANT OF GOVERNMENT'S INTENTION TO INTRODUCE
CONVICTIONS OF PRIOR CRIMES OF THE DEFENDANT AT TRIAL**

THE UNITED STATES OF AMERICA files this notice, pursuant to Federal Rule of Evidence 609(b), of its intention to introduce at trial prior convictions of crimes of the Defendant as set forth hereafter:

1. Defendant is charged with Felon in possession of a firearm.
2. Should the Defendant elect to testify, the Government intends to introduce into evidence prior convictions of crimes of the Defendant at trial.
3. Specifically, the Government intends to introduce evidence of Defendant's prior felony convictions for:
 - A. Judgment of Conviction, Residential Burglary, June 29, 2000, Jefferson County, Arkansas, Circuit Court. Defendant was sentenced to 60 months' probation.
 - B. Judgment of Conviction, Possession of Cocaine, April 18, 2015, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 12 months confinement.
 - C. Judgment of Conviction, Possession with Intent to Deliver Cocaine, June 27, 2005, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 96 months confinement.
 - D. Judgment of Conviction, Possession of Paraphernalia, June 27, 2005, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 96 months confinement.
 - E. Judgment of Conviction, Possession of Marijuana- Second offense, June 27, 2005, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 96 months confinement.
 - F. Judgment of Conviction, Possession of Drug Paraphernalia, August 25, 2006, Sebastian

County, Arkansas, Circuit Court. Defendant was sentenced to 120 months confinement.

- G. Judgment of Conviction, Possession of Xanax with Intent to Deliver, August 25, 2006, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 120 months confinement.
- H. Judgment of Conviction, Possession of Cocaine, August 25, 2006, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 120 months confinement.
- I. Judgment of Conviction, Conspiracy to Deliver Cocaine, August 25, 2006, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 144 months confinement.
- J. Judgment of Conviction, Possession of Marijuana with intent to Deliver, September 16, 2009, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 60 months confinement.
- K. Judgment of Conviction, Felon in Possession of a Firearm, February 1, 2012, Sebastian County, Arkansas, Circuit Court. Defendant was sentenced to 18 months confinement.

4. These acts will be offered should the Defendant elect to testify, as impeachment by Evidence of Conviction of Crime, Rule 609. Although this evidence may be prejudicial against the Defendant, the probative value would not be outweighed by that prejudice.

5. The Government intends to introduce these convictions of the Defendant at the trial of this cause to attack the character for truthfulness of the Defendant. These crimes are all punishable by imprisonment in excess of one year or are *crimen falsi*. Thus, the Defendant's prior convictions of crimes in this case are properly admitted under Rule 609, should he elect to testify in this case, to attack his character for truthfulness.

WHEREFORE, PREMISES CONSIDERED, the United States of America hereby provides notice to the Defendant of its intention to introduce evidence of the foregoing at the trial of this cause.

Respectfully submitted,

ASHLEY C. HOFF
UNITED STATES ATTORNEY

By: /s/ Monica L. Daniels
MONICA L. DANIELS
Assistant United States Attorney

CERTIFICATE OF SERVICE

By signing above, I hereby certify that on September 29, 2022, I filed this document with the Clerk using the CM/ECF filing system, which will cause a copy of the document to be delivered to Anthony Colton, counsel for Defendant.

/s/ Monica L. Daniels
MONICA L. DANIELS
Assistant United States Attorney